

Utilities and Transportation Commission
Standard Inspection Report for Intrastate Hazardous Liquid Systems
Records Review and Field Inspection

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
 If an item is marked U, N/A, or N/C, an explanation must be included in this report.

A completed **Inspection Checklist, Cover Letter and Field Report, IMP and OQ Field Validation Forms** are to be submitted to the Chief Engineer within **30 days** from completion of the inspection.

Inspection Report			
Inspection ID/ Docket Number	6755		
Inspector Name & Submit Date	Dennis Ritter 9/20/2016 Derek Norwood		
Chief Engineer Name & Review Date	Joe Subsits. 10/4/2016		
Operator Information			
Name of Operator:	BP Pipelines North America	OPID #:	31189
Name of Unit(s):	BP Cherry Point		
Records Location:	Records were reviewed at BP Bayview Terminal via electronic media		
Date(s) of Last Review:	October 28-30, 2013	Inspection Date(s)	August 22-24, 2016

Inspection Summary:

Overview:

Crude Oil Line: 24” diameter, 0.281” wt, API 5L grade X-52, 698 psig MOP limited by surge pressure constraint at Kinder Morgan (formally, Terasen Pipeline Ins. formally Trans Mountain Pipeline) with flange rating at Class 600. Pipeline was built in 1970. 1.8 miles of the 5 mile length are in HCAs (other population, drinking water).

Butane line: 6” diameter, 0.188” wt, API 5L Grade B, 285 psig MOP with normal operating pressure ranging from 100 to 179 psig, limited by Class 150 flange rating. Pipeline was built in 1986. 1.5 miles of the 5 mile length are in HCAs (drinking water or Ecological resource).

The 5-mile, 24inch crude oil line starts at Lake Terrell Rd at the Kinder Morgan delivery and runs to BP Cherry Point Refinery. Kinder Morgan has ANSI 150 series equipment. ANSI 600 series fittings are on The 24 inch line. The 5-mile, butane line operates from Cherry Point Refinery to the Ferndale Terminal with the two breakout tanks operated currently by AltaGas (formally Chevron).

Summary:

This inspection reviewed O&M records, ILI run digs and repairs, reporting, construction (none since last inspection), alcohol abuse and anti-drug program implementation, damage prevention and public awareness records and implementation. A field inspection of pipeline assets was conducted with operator personnel and included a review of operator personnel qualifications and field performance including identifying and reacting to abnormal conditions.

The results of the inspection identified four issues:

- 1) During review of the asbuilts (BP refers to them as “line” drawings) for both the 24” crude line (1970) and the 6” butane line (1986) overhead lines (power, phone) were not noted on the drawings. 195.266(e) specifically requires these lines to be shown. As both of these lines are post code, this information should be shown on the drawings. However, it is not known what overhead lines existed when the original construction occurred. BP will be asked to identify the overhead lines and put them on their maps. **I would say this is an area of concern.**
- 2) During field inspection, the cathodic protection specialist for BP was asked if the voltage meter and

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copper copper sulfate half cell had been calibrated per manufacturer’s recommendation and BP’s OMER. The voltage meter was calibrated however, BP stated they do not record the calibration of the half cells. They stated they use a reference cell to calibrate the half cell. In checking BP’s OMER*, it does not require the half cell to be calibrated. NACE SP 0169 Section 10.6 does state “instruments and related equipment should be maintained in good operating condition and checked for accuracy.” Additionally, 49CFR195.589(c) states “You must maintain a record of each analysis, check, demonstration, examination, inspection, investigation, review, survey and test required by this subpart in sufficient detail to demonstrate the adequacy of corrosion control measures...”

This is a concern as BP has no way of confirming the accuracy of its half cells if they have no record of calibration. **I would say this is a probable violation.**

- 3) During the Public Awareness Field audit, question 3 asks, “Does the program identify the message for Emergency and Public Officials as protecting people first and then property as the TOP priority message? It was noted that the Pamphlet for Emergency Response and Public Officials, page 5 stated that protecting people first, then property is a priority. However, this message was well down the list of bulleted items. It was not bolded nor did it stand out in any way as the TOP priority message. BP’s PA Team Lead, Larry Stansifer will discuss with Paradigm. This is a concern as this message is a priority in educating emergency officials about the response from pipeline personnel. **I would say this is a probable violation.**
- 4) The pump supplying energy to move the butane via the pipeline to AltaGas (5miles south) in previous inspections was considered non-regulated. It is unclear as to why this is the case. The pump is dedicated to move product from BP Cherry Point refinery to AltaGas. This would be considered part of the “pipeline system” per 49CFR 195.2 Definitions. During the exit interview, this was discussed with BP and that WUTC would evaluate the non-regulated status. After further review, it appears that the pump station should be regulated. An email was sent to John Newhouse, BP DOT Compliance Advisor, on 9/16/2016 with the DOT Jurisdictional Tank Drawings 9&12, to inform him of this finding and to have BP explain their rationale if they believe differently. No return email was received from BP. **I would state this clarification in the findings report and note that BP will be required to have all required pump station records available for the next inspection.**

*-OMER 195.551 Corrosion Control.

HQ Address: M.C. 9S 30S Wacker Drive Chicago, IL 60606		System/Unit Address: 14789 Ovenell Road, Mount Vernon, WA 98273	
Co. Official:	Gerald Maret	Phone No.:	4259812517
Phone No.:	6307302866	Fax No.:	
Fax No.:		Emergency Phone No.:	8882718880 OPL Control Room
Emergency Phone No.:	8005486482 Tulsa Control Room		
Persons Interviewed		Title	
Joe Fraley		North Area O&M Team Lead	
Jim Fraley		Damage Prevention Team Lead	
Kelli Gustaf		Crisis Management Advisor	
		Phone No.	
		4259812517	
		4252357743	

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John Newhouse	DOT Compliance Advisor	3317023023
Jim Bruen	DOT Team Leader	3317023367
Larry Stansifer	Damage Prevention Program Coordinator	918-660-4360
Isaac Reinholdt	Corrosion Specialist	4259812573
Brian Stone	Corrosion Team Leader	
Charles Groves	Operator	

Have incident reports and the annual report been reviewed for accuracy and analyzed for trends and operator issues? Yes No

Comments:

- 6” butane line was pigged in 2015 with caliper and MFL tools. 4 anomalies, all in HCAs, 1 repaired. No reported SRCs.
- 24” crude line is part of 748.1 miles of pipeline covered under this OPID. It was last pigged in 2014 using calibration and MFL tools. 4 anomalies, all in HCAs. 1 immediate, 3 60-d. All were repaired. No reported SRCs.

No incidents since last inspection. Reviewed annual reports from 2013 to 2016. No issues noted.

UTC staff conducted abbreviated procedures inspection on 195 O&M and WAC items that changed since the last inspection. This checklist focuses on Records and Field items per a routine standard inspection.
 (check one below and enter appropriate date)

Team inspection was performed (Within the past five years.) or,	Date:	
Other UTC Inspector reviewed the O & M Manual (Since the last yearly review of the manual by the operator.)	Date:	10/19-20/2015

PART 199 DRUG and ALCOHOL TESTING REGULATIONS and PROCEDURES		S	U	NA	NC
Subparts A - C	Drug & Alcohol Testing & Misuse Prevention Program – Use PHMSA Form #13, Rev 3/19/2010. Do not ask the company to have a drug and alcohol expert available for this portion of your inspection. See Form 13	x			

OIL POLLUTION ACT	Yes	No
Have you submitted your spill response plan to PHMSA for review? PHMSA Letter of Approval dated July 28, 2016	x	

Comments:

RECORDS REVIEW			S	U	NA	NC
CONVERSION TO SERVICE No Conversions						
1.	195.5(a)(2)	All aboveground segments of the pipeline, and appropriately selected underground segments must be visually inspected for physical defects and operating conditions which reasonably could be expected to impair the strength or tightness of the pipeline.			x	
2.	195.5(c)	Pipeline Records (Life of System)			x	
3.		Pipeline Investigations			x	
4.		Pipeline Testing			x	
5.		Pipeline Repairs			x	

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RECORDS REVIEW			S	U	NA	NC
6.		Pipeline Replacements			x	
7.		Pipeline Alterations			x	
REGULATED RURAL GATHERING LINES No Gathering lines			S	U	NA	NC
8.	195.11(a)	Operator has identified pipelines that are Regulated Rural Gathering Lines that meet all of the following criteria: (Amt. 195-89, Pub. 06/03/08 eff. 07/03/08). (1) nominal diameter from 6 5/8 inches to 8 5/8 inches; (2) located in or within one-quarter mile of a USA (3) operates at an MOP established under §195.406 that is: (i) greater than 20% SMYS; or (ii) if the stress level is unknown, or not steel; > 125 psig.			x	
9.	195.11(b)	Operator has prepared written procedures to carry out the requirements of 195.11 . (Amt. 195-89, Pub. 06/03/08 eff. 07/03/08). <ul style="list-style-type: none"> • Subpart B Reporting • Corrosion Control • Damage Prevention • Public Awareness • Establish MAOP • Line Markers • Operator Qualification 			x	
10.	195.11(c)	If a new USA is identified after July 3, 2008, the operator must implement the requirements in paragraphs (b)(2 - 8), and (b)(11) for affected pipelines within 6 months of identification. For steel pipelines, comply with the deadlines in paragraphs (b)(9 & 10).			x	
11.	195.11(d)	Operator must maintain: (Amt. 195-89, Pub. 06/03/08 eff. 07/03/08). (1) Segment identification records required in paragraph (b)(1) of this section and the records required to comply with (b)(10) of this section, for the life of the pipe. (2) Records necessary to demonstrate compliance (b)(2 – 9 & 11) of this section according to the record retention requirements of the referenced section or subpart.			x	

Comments:

LOW-STRESS PIPELINES IN RURAL AREA No Low Stress lines			S	U	NA	NC
12.	195.12(a)	Operator has identified pipelines that are Regulated Low-stress Pipelines in Rural Areas that meet all of the following criteria: (except for those already covered by 49 CFR 195) (Amt. 195-89, Pub. 06/03/08 eff. 07/03/08). (1) nominal diameter of 8 5/8 inches or more; (2) located in or within one-half mile of a USA (3) operates at an MOP established under §195.406 that is: (i) greater than 20% SMYS; or (ii) if the stress level is unknown, or not steel; > 125 psig.			x	
13.	195.12(b)	Operator has prepared written procedures to carry out the requirements of 195.12 . (Amt. 195-89, Pub. 06/03/08 eff. 07/03/08). <ul style="list-style-type: none"> • Subpart B Reporting • Establish Integrity Management Plan • All Part 195 Safety Requirements 			x	
14.	195.12 (c)(1)	Operator may notify PHMSA of economic burden. (Amt. Pub. 06/03/08 eff. 07/03/08).			x	

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15.	195.12(d)	If, after July 3, 2008, a new USA is identified, the operator must implement the requirements in paragraphs (b)(2)(i) for affected pipelines within 12 months of identification. (Amt. 195-89, Pub. 06/03/08 eff. 07/03/08).			x	
16.	195.12(d)	Operator must maintain: (Amt. 195-89, Pub. 06/03/08 eff. 07/03/08). (1) Segment identification records required in paragraph (b)(1) for the life of the pipeline. (2) Records necessary to demonstrate compliance (b)(2 – 4) according to the record retention requirements of the referenced section or subpart.			x	

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REPORTING						
17.	49 U.S.C. 60132, Subsection (b) ADB-03-02 ADB-08-07	Submission of Data to the National Pipeline Mapping System Under the Pipeline Safety Improvement Act of 2002	x			
		Do records indicate: NPMS submissions are updated every 12 months if system modifications (excludes distribution lines and gathering lines) occurred, and if no modifications occurred an email to that effect was submitted? 6/7/2016, 3/11/2015, 5/16/2014				
18.	RCW 81.88.080	Pipeline Mapping System: Has the operator provided accurate maps (or updates) of pipelines, operating over two hundred fifty pounds per square inch gauge, to specifications developed by the commission sufficient to meet the needs of first responders?	x			
19.	195.48/49	Complete and submit DOT Form PHMSA F 7000-1.1 for each type of hazardous liquid pipeline facility operated at the end of the previous year for each commodity, and each state a pipeline traverses by June 15 of each calendar year. Reviewed in office.	x			
20.	195.52	Immediate notice to NRC (800) 424-8802, or electronically at http://www.nrc.uscg.mil , of certain events, and additional report if significant new information becomes available. Operator must have a written procedure for calculating an initial estimate of the amount of product released in an accident. (Amdt. 195-95, 75 FR 72878, November 26, 2010, eff. 1/1/2011). none				x
21.	195.54(a)	Accident Report - file as soon as practicable, but no later than 30 days after discovery. Submittal must be electronically to http://portal.phmsa.dot.gov/pipeline (Amdt. 195-95, 75 FR 72878, November 26, 2010). none				x
22.	195.54 (b)	Supplemental report - required within 30 days of information change/addition (DOT Form 7000-1) none				x
23.	195.56(a)	SRC Report is required to be filed within five (5) working days of the determination and within ten (10) working days after discovery 195.56(a) (195.55(a)) none				x
24.	195.56(b)	SRC Report requirements, including corrective actions (taken and planned) none				x
25.	195.57	Do records indicate reports were submitted within 60 days of completing inspection of underwater pipelines? 195.413(a) (195.57) no reports				x
26.	195.59	Do records indicate reports were filed for abandoned offshore pipeline facilities or abandoned onshore pipeline facilities that crosses over, under or through a commercially navigable waterway? No reports				x
27.	195.64	Each operator must obtain an OPID, validate its OPIDs, and notify PHMSA of certain events at http://portal.phmsa.dot.gov/pipeline (Amdt. 195-95, 75 FR 72878, Nov.26, 2010, eff. 1/1/2011).	x			
28.	480-75-610	Report construction for new pipelines (>100 feet) new pipe 45 days prior to new construction none				x
29.	480-75-620	Was MOP changed based on hydrotest? Report submitted? No hydrotest				x
30.	480-75-630(1)	Telephonic Reports to UTC Pipeline Safety Incident Notification 1-888-321-9144 (Within 2 hours of discovery) for events which results in; no notifications a) A fatality; (b) Personal injury requiring hospitalization; (c) Fire or explosion not intentionally set by the pipeline company; (d) Spills of five gallons or more of product from the pipeline; (e) Damage to the property of the pipeline company and others of a combined total cost exceeding twenty-five thousand dollars (automobile collisions and other equipment accidents not involving hazardous liquid or hazardous-liquid-handling equipment need not be reported under this rule); (f) A significant occurrence in the judgment of the pipeline company, even though it does not meet the criteria of (a) through (e) of this subsection; (g) The news media reports the occurrence, even though it does not meet the criteria of (a) through (f) of this subsection.				x

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31.	480-75-630(2)	Written reports to the commission within 30 calendar days of the incident. The report must include the following: a) Name(s) and address(es) of any person or persons injured or killed or whose property was damaged; (b) The extent of injuries and damage; (c) A description of the incident including date, time, and place; (d) A description and maximum operating pressure of the pipeline implicated in the incident and the system operating pressure at the time of the incident; (e) The date and time the pipeline returns to safe operations; and (f) The date, time, and type of any temporary or permanent repair.				X	
32.	480-75-630(3)	Telephonic notification within twenty-four hours of emergency situations including emergency shutdowns, material defects, or physical damage that impairs the serviceability of the pipeline. No notifications				X	
33.	480-75-630(4)	Filing Reports of Damage to Hazardous Liquid Pipeline Facilities to the commission. (eff 4/1/2013) Operator is part of one-call and would use DIRT but has not had any reporting required as no dig-ins. (Via the commission's Virtual DIRT system or on-line damage reporting form)					
34.	480-75-630(4)(a)	Does the operator report to the commission the requirements set forth in RCW 19.122.053(3) (a) through (n) No damage to report on DIRT				X	
35.	480-75-630(4)(b)	Does the operator report the name, address, and phone number of the person or entity that the company has reason to believe may have caused damage due to excavations conducted without facility locates first being completed? No damage to report on DIRT				X	
36.	480-75-630(4)(c)	Does the operator retain all damage and damage claim records it creates related to damage events reported under 93-200(7)(b), including photographs and documentation supporting the conclusion that a facilities locate was not completed? No damage to report on DIRT Note: Records maintained for two years and made available to the commission upon request.				X	
37.	480-75-630(5)	Does the operator provide the following information to excavators who damage hazardous liquid pipeline facilities?					
38.	480-75-630(5)(a)	<ul style="list-style-type: none"> Notification requirements for excavators under RCW 19.122.050(1) No damage to report on DIRT 				X	
39.	480-75-630(5)(b)	<ul style="list-style-type: none"> A description of the excavator's responsibilities for reporting damages under RCW 19.122.053; and No damage to report on DIRT 				X	
40.	480-75-630(5)(c)	<ul style="list-style-type: none"> Information concerning the safety committee referenced under RCW 19.122.130, including committee contact information, and the process for filing a complaint with the safety committee. No damage to report on DIRT 				X	
41.	480-75-630(6)	Reports to the commission only when the operator or its contractor observes or becomes aware of the following activities... No damage to report on DIRT <ul style="list-style-type: none"> An excavator digs within thirty-five feet of a transmission pipeline, as defined by RCW 19.122.020(26) without first obtaining a facilities locate; (630(6)(a) A person intentionally damages or removes marks indicating the location or presence of hazardous liquid pipeline facilities. 630(6)(b) 				X	

Comments:

CONSTRUCTION			S	U	NA	NC
42.	195.204	Construction Training/Qualification records including personnel who conduct visual inspections (e.g. inspectors of welds) no new construction since last inspection (2013)			X	

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43.	195.214(b)	Detailed Test Results to Qualify Welding Procedures and Qualifying tests no new construction since last inspection (2013)			X	
44.	195.222(a)	Welders must be qualified in accordance with Section 6 of API Standard 1104 (20th edition 2005, including errata/addendum 7/2007 and errata 2 12/2008) or Section IX of the ASME Boiler and Pressure Vessel Code (2007 edition, July 1, 2007) , except that a welder qualified under an earlier edition than currently listed in 195.3 may weld, but may not requalify under that earlier edition. (Amdt 195-94 Pub. 8/11/10 eff. 10/01/10). no new construction since last inspection (2013)			X	
45.	195.222(b)	Welders may not weld with a particular welding process unless, within the preceding 6 calendar months, the welder has (1) Engaged in welding with that process; and (2) Had one weld tested and found acceptable under Section 9 of API 1104. no new construction since last inspection (2013)			X	
46.	195.226(a)	Arc burns must be repaired. none			X	
47.	195.226(b)	If a notch is not repairable by grinding, a cylinder of the pipe containing the entire notch must be removed. none Do arc burn repair procedures require verification of the removal of the metallurgical notch by nondestructive testing? (Ammonium Persulfate).			X	
48.	195.226(c)	The ground wire may not be welded to the pipe/fitting being welded. no new construction since last inspection (2013)			X	
49.	195.228/.234	Do procedures require welds to be nondestructively tested to ensure their acceptability according to API 1104 and as per 195.228(b) and per the requirements of 195.234 in regard to the number of welds to be tested? no new construction since last inspection (2013)			X	
50.	195.234(b)	Nondestructive testing of welds performed: no new construction since last inspection (2013) (1) In accordance with written procedures for NDT (2) By qualified personnel (3) By a process that will indicate any defects that may affect the integrity of the weld			X	
51.	195.234(d) 195.266(a)	Do records demonstrate at least 10% of all welds that are made by each welder during each welding day are nondestructively tested over the entire circumference of the welds or that more welds are tested per the operator's own procedures? no new construction since last inspection (2013)			X	
52.	195.234(e) 195.266(a)	Do records demonstrate all girth welds installed each day in selected locations specified in §195.234(e) are nondestructively tested over their entire circumference? no new construction since last inspection (2013)			X	
53.	195.234(f) 195.266(a)	Do records demonstrate that when installing used pipe, 100% of the old girth welds are nondestructively tested? no new construction since last inspection (2013)			X	
54.	195.234(g) 195.266(a)	Do records demonstrate 100% of the girth welds have been nondestructively tested at selected pipe tie-ins? no new construction since last inspection (2013)			X	
55.	195.266	Construction Records maintained for life of pipeline Jones Associates Arco-Cherry Point As Built 24" Pipeline dwgs, July 1971. Arco Petroleum Products Co. 6" Butane line to Cal Gas Plant Dwgs, 6/1986				
56.	195.266(b)	Amount, Location, Cover of each Size of Pipe Installed	X			
57.	195.266(c)	Location of each Crossing with another Pipeline	X			
58.	195.266(d)	Location of each buried Utility Crossing	X			
59.	195.266(e)	Location of Overhead Crossings no overhead lines noted on as built drawings		X		
60.	195.266(f)	Location of each Valve and Test Station (no valves on crude line except at terminals) • Cherry Point Crude Teresen Launcher Valve Replacement P7500-15-VN-507	X			
PRESSURE TESTING			S	U	NA	NC
61.	195.302(a)	Pipelines, and each pipeline segment that has been relocated, replaced, or otherwise changed, must be pressure tested without leakage (see .302(b), .303, and .305(b) for exceptions). Cherry Point Butane ILI Project 4/15/15--13'11" extension of launcher, 460 psi test, MOP 275	X			

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62.	195.302(b)/ .302(c)	<p>Except for lines converted under §195.5, the following pipelines <i>may</i> be operated without having been pressure tested per Subpart E and without having established MOP under 195.406(a)(5) [80% of the 4 hour documented test pressure, or 80% of the 4 hour documented operating pressure].</p> <ul style="list-style-type: none"> - .302(b)(2)(ii): Any carbon dioxide pipeline constructed before July 12, 1991, that is located in a rural area as part of a production field distribution system. - .302(b)(3): Any low-stress pipeline constructed before August 11, 1994, that does not transport HVL. - .302(b)(4)/.303: Those portions of older hazardous liquid and carbon dioxide pipelines for which an operator has elected the risk-based alternative under §195.303 and which are not required to be tested based on the risk-based criteria. <p><i>Note: (An operator that elected to follow a risk-based alternative must have developed plans that included the method of testing and a schedule for the testing by December 7, 1998. The compliance deadlines for completion of testing are as shown in the table in §195.303, and in no case was testing to be completed later than 12/07/2004).</i></p>				
63.		Have all pipelines <u>other than those described above</u> been pressure tested per Subpart E? looked at 24" Crude line pressure test 8/2001	x			
64.		If pipelines <u>other than those described above</u> have not been pressure tested per Subpart E, has MOP been established under 195.406(a)(5), in accordance with .302(c)? none			x	
65.	195.304	Test pressure must be maintained for at least 4 continuous hours at a pressure equal to 125 percent, or more, of the MOP. If not visually inspected during the test, at least an additional 4 hours at 110 percent of MOP is required. Cherry Point Butane ILI Project 4/15/15--13'11" extension of launcher	x			
66.	195.305(a)	All pipe, all attached fittings, including components, must be pressure tested in accordance with 195.302. Cherry Point Butane ILI Project 4/15/15--13'11" extension of launcher Note: A component, other than pipe, that is the only item being replaced or added to the pipeline system need not be hydrostatically tested under paragraph (a) of this section if the manufacturer certifies that either: (1) The component was hydrostatically tested at the factory; or (2) The component was manufactured under a quality control system that ensures each component is at least equal in strength to a prototype that was hydrostatically tested at the factory.	x			
67.	195.305(b)	Manufacturer testing of components. Records available and adequate? No components			x	
68.	195.306	Appropriate test medium	x			
69.	195.308	Pipe associated with tie-ins pressure tested?	x			
70.	195.310(a)	Pipeline Test Records for useful life of facilities? 8/2001 24"Crude Line 1047 psi OK, butane 425 psig for 8 hours on 3/11/1999.	x			
71.	195.310(b)	Do test records required by paragraph (a) include:				
72.	195.310(b)(1)	Pressure recording charts	x			
73.	195.310(b)(2)	Test instrument calibration records	x			
74.	195.310(b)(3)	Name of operator, person responsible, test company used, if any	x			
75.	195.310(b)(4)	Date and time of test	x			
76.	195.310(b)(5)	Minimum test pressure	x			
77.	195.310(b)(6)	Test medium	x			
78.	195.310(b)(7)	Description of the facility tested and the apparatus	x			
79.	195.310(b)(8)	Explanation of any pressure discontinuities, including test failures that appear on the pressure recording charts. none			x	
80.	195.310(b)(9)	Where elevation differences in the test section exceed 100 feet , a profile of the elevation over the entire length of the test section must be included no elevation change-launcher extension			x	
81.	195.310(b)(10)	Temperature of the test medium or pipe during the test period	x			

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Comments:

INTERNAL DESIGN PRESSURE PROCEDURES		S	U	NA	NC
.402(c)/.422	Internal design pressure for pipe in a pipeline is determined in accordance with the requirements of this section and the formula: $P = (2 \text{ St/D}) \times E \times F$. .106 Note MOP based on ANSI CI 150 flanges at 275 psig and Crude line at 698 psig. Also, booster pumps at Cherry Point for butane line deadhead at 198 psig.	x			

OPERATION & MAINTENANCE		S	U	NA	NC
82.	195.402(a)	Annual Review of O&M Manual (1 per yr/15 months) OMER Review Meetings, MOC, March 3-5, 2015, April 2016	x		
83.		Appropriate parts must be kept at locations where O&M activities are conducted All online, printed copies only good for 24 hrs.	x		
84.	195.402(c)(4)	Determination of Areas requiring immediate response for Failures or Malfunctions based on HCA mapping, but entire lines are 5 miles so all is immediate response	x		
85.	195.402(c)(5)	Pipeline accidents analyzed to determine their causes none		x	
86.	195.402(c)(10)	Abandoning pipeline facilities, including safe disconnection from an operating pipeline system, purging of combustibles, and sealing abandoned environmental hazards. none Reporting abandoned pipeline facilities offshore, or onshore crossing commercially navigable waterways per 195.59		x	
87.	195.402(c)(12)	Establishment/Maintaining liaison with Fire, Police, and other Public Officials spill response drills and PA notifications and attend local emergency planning councils for all Whatcom.	x		
88.	195.402(c)(13)	Periodic review of personnel work – effectiveness of normal O&M procedures and corrective action when deficiencies are found BP OQ group handles normal O&M procedures annually-2015 Work Procedures Survey.	x		
89.	195.402(c)(15)	Implementing the applicable control room management procedures required by 195.446. (Amdt. 195-93, 74 FR 63310, December 3, 2009, eff. 2/1/2010). WUTC will conduct a control room audit Oct 10-14, 2016. Checked OMER for procedure implementation P195.446	x		
90.	195.402(e)(1)	Records that indicate receiving, identifying, classifying and communicating notices of events requiring immediate response in accordance with procedures. UG1976 is Plan number for abnormal events. Each gets a unique work order number associated with UG1976.	x		
91.	195.402(e)(2)	Prompt and effective response to each type of emergency Note: Review operator records of previous accidents and failures including third-party damage and leak response none		x	

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92.	195.402(e)(7)	Records indicating that notifications were made to fire, police, and other appropriate public officials of hazardous liquid emergencies and were coordinated with preplanned and actual responses (including additional precautions necessary for an emergency involving HVLS)? <ul style="list-style-type: none"> • Nooksack River Diesel Spill Nov 13, 2014 Worst Case, sign in roster, invite list • May Creek Drill Table Top, Aug 19, 2015 • 3 deployment drills 2014: North Skagit River Dike, Nov 4, 2014 • Central Area Sammamish River, Oct 28, 2014 • South Area, Multnomah Channel, July 16, 2014 • New Century Modelling for fresh water • NOAA modelling for marine 	x			
93.	195.402(e)(9)	Post accident review of employees' activities to determine if procedures were effective and corrective action was taken? none			x	
94.	195.402(e)(10)	Actions to be taken by a controller during an emergency in accordance with 195.446 . (Amdt. 195-93, 74 FR 63310, December 3, 2009, eff. 2/1/2010). none			x	
95.	195.403(a)	Records of operator provided training to its emergency response personnel as required <ul style="list-style-type: none"> • Nooksack River Diesel Spill Nov 13, 2014 Worst Case, sign in roster, invite list • May Creek Drill Table Top, Aug 19, 2015 • 3 deployment drills 2014: North Skagit River Dike, Nov 4, 2014 • Central Area Sammamish River, Oct 28, 2014 	x			
96.	195.403(b)(1)	<ul style="list-style-type: none"> • Annual review with personnel on performance in meeting the objectives of the emergency response training program (1 per yr/15 months) Nooksack River Diesel Spill Nov 13, 2014 Worst Case, sign in roster, invite list • May Creek Drill Table Top, Aug 19, 2015 • 3 deployment drills 2014: North Skagit River Dike, Nov 4, 2014 • Central Area Sammamish River, Oct 28, 2014 	x			
97.	195.403(b)(2)	Make appropriate changes to the emergency response training program (1 per yr/15 months) All changes to Emergency Response Plan updates would go into Traction, which then is polled and identified on a dashboard tracker by each manager responsible for update. No Traction items for NW lines (gas line, butane and crude).	x			

Comments:

OPERATION & MAINTENANCE (Cont)			S	U	NA	NC
98.	195.403(c)	Verification of supervisor knowledge of emergency response procedures (1 per yr/15 months) Checked supervisors attended spill drills noted above	x			

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99.	195.404(a)(1)	Maps and Records of the following facilities maintained and made available: i. Breakout tanks ii. Pump stations iii. Scraper and sphere facilities iv. Pipeline valves v. Facilities to which 195.402(c)(9) applies vi. Rights-of-way vii. Safety devices to which 195.428 applies	x			
100.	195.404(a)(2)	All crossings of public roads, railroads, rivers, buried utilities and foreign pipelines.	x			
101.	195.404(a)(3)	The maximum operating pressure of each pipeline in accordance with 195.406 MODP butane is 275 psi, MODP of crude 698 psi. BP has a separate procedure OMER 195.406.	x			
102.	195.404(a)(4)	The diameter, grade, type, and nominal wall thickness of all pipe. Looked at two segments for crude line	x			
103.	195.404(b)(2) 195.402(d)(1)	Response to any emergency or abnormal operations applicable under 195.402 (maintained for at least 3yrs) as required by written procedures none			x	
104.	195.404(b) 195.402(d)(5)	Periodic review of personnel work – effectiveness of abnormal operation procedures/corrective action taken when deficiencies found. Monthly HSE reviews sent to all operating districts, annual OMER update by DOT team look at selection of events and review. Then goes through MOC process if group elects to change OMER (195.402(d))	x			
105.	195.404(c)(1)	The date, location, and description of each repair made on the pipe and maintain it for the life of the pipe. Life of pipeline--Looked at original MTRs for butane and crude line-two each with differing characteristics (wall thickness). 2015 ILI Run 6-inch Cherry Point to Ferndale Butane line Rosen ILI run: 4 repairs all clocksprings: 2015-001-dent with metal loss, 5:15 clock position, 12% metal loss, 1.10% dent, actual 28.33% with 1.36% dent; clockspring 2015-002-dent with metal loss, 4:50 clock position, 23% metal loss, 1% dent; 32.78% actual, 0.91% dent clockspring 2015-003-corrosion at 5:45 clock position, 48% wall loss, 50.29% actual, clockspring 2015-004-2 anomalies: 1)corrosion with metal loss 4:29 clock position, 59% wall loss, actual 57.45%; clockspring; 2) corrosion with metal loss 4:44 clock position, 12% wall loss, actual 23.94%; clockspring (note-one clockspring for both anomalies as within a foot of each other). 2014 24-inch Terasen (lake Terrell) to Cherry Point Rosen ILI run: 2014-002 dent with metal loss, 60-d repair, 5:04 clock position, 9% metal loss, 2% dent; 2.5% actual metal loss, 0.7% dent. No repair, recoated. 2014-003 dent with metal loss, 60-d repair, 6:15 clock position, 9% metal loss, 1.4% dent; 16.4% metal loss, 0.33% dent actual; repair clockspring.	x			
106.	195.404(c)(2)	The date, location, and description of each repair made to parts of the pipeline system other than the pipe and maintain it for at least 1 year. None since last inspection			x	
107.	195.404(c)(3)	Each inspection and test required by Subpart F shall be maintained for at least 2 years, or until the next inspection or test is performed, whichever is longer. Note this would be O&M records	x			
108.	195.406(a)/ .406(a)(1)	Except for surge pressures and other variations from normal operations, no operator shall operate a pipeline above the MOP, and the MOP may not exceed any of the following; • The internal design pressure of the pipe determined by 195.106. no exceedances of MOP			x	
109.	480-75-620	Change in MOP? Changed based on hydrotest? none			x	
110.	195.408(b)	Records indicating emergency communication system(s) use was as required The following Drills used emergency comm measures: • Nooksack River Diesel Spill Nov 13, 2014 Worst Case, sign in roster, invite list • May Creek Drill Table Top, Aug 19, 2015 • 3 deployment drills 2014: North Skagit River Dike, Nov 4, 2014 • Central Area Sammamish River, Oct 28, 2014	x			

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111.	195.412(a)	Operator must inspect the right-of-way at intervals not exceeding 3 weeks , but at least 26 times each calendar year Barr Aerial Patrol. 2016, 2015, 2014	x			
112.	195.412(b)	Records indicating ROW surface conditions and crossings under navigable waterways were inspected, and reporting and appropriate mitigation performed none			x	
113.	480-75-640	Depth of cover surveys and mitigation none since last inspection, due in 2017			x	
114.	195.420(b)	Mainline valves inspected to determine that it is functioning properly at intervals not exceeding 7½ months , but at least twice each calendar year. 2014, 2015, 2016	x			
115.	480-75-500	Pipe movement study per API 1117 none			x	
116.	195.428(a)	Insp. of overpressure safety devices (1 per yr/15 months non-HVL; 2 per yr/7½ months HVL) 2014, 2015, 2016	x			
117.	195.428(b)	Inspection of Relief Devices on HVL Tanks (intervals NTE 5 yrs). none			x	
118.	195.428(c)	Above ground breakout tanks that are constructed or significantly altered according to API Standard 2510 after October 2, 2000, must have an overfill protection system installed according to section 5.1.2 of API Standard 2510. Amt. 195-86 Pub. 06/09/06 eff. 07/10/06. No breakout tanks (tanks are operated by AltaGas) Tanks over 600 gallons (2271 liters) constructed or significantly altered after October 2, 2000, must have overfill protection according to API Recommended Practice 2350 unless operator noted in procedures manual (195.402) why compliance with API RP 2350 is not necessary for the safety of a particular breakout tank.			x	
119.	195.428(d)	Inspection of Overfill Systems (1 per yr/15 months non-HVL; 2 per yr/7½ months HVL) none			x	
120.	480-75-300 (3)	Leak detection and alarm records Event log at Tulsa control center, UG1976 is Plan number for abnormal events. Each gets a unique work order number associated with UG1976. These were alarm records received in Tulsa Control room	x			
121.	480-75-320	Surge analysis done? Crude line, latest revision 4/15/13. According to BP (Kurt Hayashida) Case 4 is worst case. This case requires 110 gals of crude to relief at Kinder Morgan surge tank in Ferndale for Kinder piping. Graph on pp 14 shows for mile 32 to 37 (BP Crude), no issues with surge.	x			
122.	195.430	Inspection of Fire Fighting Equipment	x			
123.	195.432(c)	Breakout Tanks: Inspect the physical integrity of in-service steel aboveground breakout tanks built to API Standard 2510 according to Section 6 of API 510 . Amt. 195-86 Pub. 06/09/06 eff 07/10/06. Note: For Break-out tank unit inspection, refer to Breakout Tank Form No breakout tanks			x	

PUBLIC AWARENESS PROGRAM PROCEDURES (In accordance with API RP 1162)	S	U	NA	NC
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124.	195.440 (e & f)	PUBLIC AWARENESS PROGRAM		x			
		Documentation properly and adequately reflects implementation of operator's Public Awareness Program requirements – Stakeholder Audience identification, message type and content, delivery method and frequency, supplemental enhancements, program evaluations, etc. (i.e. contact or mailing rosters, postage receipts, return receipts, audience contact documentation, etc. for emergency responder, public officials, school superintendents, program evaluations, etc). See table below.					
		Operators in existence on June 20, 2005, must have completed their written program no later than June 20, 2006					
		API RP 1162 Baseline* Recommended Message Delivery Frequencies					
		Stakeholder Audience (Hazardous Liquid Operators)	Baseline Message Frequency (Starting from Effective Date of Plan)				
		Residence along right-of-way and Places of Congregation	2 Years OK				
		Emergency Officials	Annual OK				
		Public Officials	3 Years (annually)				
		Excavator and Contractors	Annual OK				
		One-Call Centers	As required of one-call center				
* Refer to API RP 1162 for additional requirements, including general program recommendations, supplemental requirements, record keeping, program evaluation, etc.							
125.	.440(g)	The program must be conducted in English and any other languages commonly understood by a significant number of the population in the operator's area. Spanish Whatcom County	x				
126.	.440(i)	Records indicating that the continuing public education program evaluation process has been implemented and do records indicate that continuous improvement is being implemented 2014 letter to all farmers in Whatcom and Skagit counties regarding location of pipeline. This was a finding in the annual audit from that year.	x				

Comments:

DAMAGE PREVENTION PROGRAM			S	U	NA	NC
127.	195.442(a)	Records indicating the damage prevention program is being carried out as written	x			
128.	195.442(c)(1)	List of Current Excavators 2015 list, picked excavator to ensure they were actually in Whatcom County. ATT, Action Concrete Cutting	x			
129.	195.442(c)(2)	Notification of Public/Excavators	x			
130.	195.442(c)(3)	Notifications of planned excavations. (One -Call Records) Nov 11, 2015, Oct 13, 2015-Dig Track program.	x			
131.	195.442(c)(4)	If the operator has buried pipelines in the area of excavation activity, provide for actual notification of persons who give notice of their intent to excavate of the type of temporary marking to be provided and how to identify the markings.	x			
132.	195.442(c)(5)	Provide for temporary marking of buried pipelines in the area of excavation activity before, as far as practical, the activity begins.	x			
133.	195.442(c)(6)	Provide as follows for inspection of pipelines that an operator has reason to believe could be damaged by excavation activities:				
134.		1. Is the inspection the done as frequently as necessary during and after the activities to verify the integrity of the pipeline? none			x	
135.		2. In the case of blasting, does the inspection include leakage surveys? (required) none			x	

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Comments:

CORROSION CONTROL			S	U	NA	NC
145.	195.589(c) 195.555	Supervisors maintain thorough knowledge of corrosion procedures. Corrosion Control Procedure P195.551	x			
146.	195.589(c) 195.567(c)	Test lead maintenance / Frequent enough intervals annual P/S survey, if bad, scheduled for repair	x			
147.	480-75-510	Corrosion remediation within 90 days none			x	
148.	195.589(c) 195.569	Inspection of Exposed Buried Pipelines (External Corrosion) see question 105 for list of exposed pipes (dig sites)	x			
149.	195.589(c) 195.573(a)(1)	External Corrosion Control, Protected Pipelines Annual CP tests (1 per yr/15 months) checked 2014, 15, 16 (to present)	x			
150.	195.589(c) 195.573(a)(2)	Close Interval Surveys - when circumstances dictated a need for surveys, dates of completed surveys, data from completed surveys and analysis of completed surveys? Last completed in 2013, next scheduled in 2018.			x	
151.	195.589(c) 195.573(b)(1) & (2)	External Corrosion Control, Unprotected Pipeline Surveys, CP active corrosion areas (1 per 3 cal yr/NTE 39 months)			x	
152.	195.589(c) 195.573(c)	Interference Bonds, reverse current switches, diodes, rectifiers bonded to OPL but regulated under OPL			x	
153.	195.589(c) 195.573(e)	Do records document adequate operator actions taken to correct any identified deficiencies in corrosion control? none			x	
154.	195.589(c) 195.575(a-d)	Electrical isolation inspection, testing and monitoring (if applicable) checked 2014, 15, 16 (to present)	x			
155.	195.589(c) 195.577(a)	Testing for Interference Currents checked 2014, 15, 16 (to present) (none found)	x			
156.	195.589(c) 195.579(a)	Corrosive effects investigation monitoring now, if reach threshold triggers investigation at 5mls/yr			x	
157.	195.589(c) 195.579(b)	Examination of Coupons/Other Types of Internal Corrosion Monitoring Equipment (2 per yr/NTE 7½ months) have internal probes for corrosion monitoring. 0.8 mls per year	x			
158.	195.589(c) 195.579(b)(1-3)	Corrosion inhibitors used in sufficient quantities no internal corrosion inhibitors-monitoring			x	
159.	195.589(c) 195.579(a)(c)	Inspection of Removed Pipe for Internal Corrosion Repair and Inspection Report: removed valves on Terresen 24" crude and 16" valve, did internal corrosion inspection (B5). 4/30/15	x			
160.	195.589(c) 195.583(a-c)	Atmos. Corr. Monitoring (1 per 3 cal yr/39 months onshore; 1 per yr/15 months offshore) 10/2013, 6/2016 monitoring	x			
161.	195.589(c) 195.585(a)	General Corrosion – Reduce MOP or repair ; ASME B31G or RSTRENG none			x	
162.	195.585(b)	Localized Corrosion Pitting – replace, repair, reduce MOP none			x	
163.	195.589(a)&(b) 195.563(a)	Cathodic Protection Do records document when cathodic protection was operational on constructed, relocated, replaced, or otherwise changed pipelines within the last 5 years? (Maps showing anode location, test stations, CP systems, protected pipelines, etc.) none			x	

Comments:

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Comments:

FIELD REVIEW			S	U	N/A	N/C
164.	195.262(a)	Has adequate ventilation been provided at pump station buildings? No pump station building			x	
165.	195.262(a)	Have warning devices that warn of the presence of hazardous vapors been installed at new pump station buildings? No pump stations building.			x	
166.	195.262(b)	Has a device for activating emergency shutdown of the pump station been installed? crude line uses Kinder Morgan line pressure; butane line has pump internal to refinery. Note: pump station was not checked during this inspection as were considered “not regulated”. However, it appears the station should be included in regulated facilities—see Inspection Summary			x	x
167.	195.262(b)	If power is needed to actuate safety devices, has an auxiliary power supply been provided? No pump stations: crude line uses Kinder Morgan line pressure; butane line has pump internal to refinery. Note: pump station was not checked during this inspection as were considered “not regulated”. However, it appears the station should be included in regulated facilities—see Inspection Summary.			x	
168.	195.262(b)	Have safety devices been installed to prevent over-pressuring new or modified pumping equipment? No pump stations: crude line uses Kinder Morgan line pressure; Note: butane line pump station was not checked during this inspection as were considered “not regulated”. However, it appears the station should be included in regulated facilities—see Inspection Summary.			x	
169.	195.262(d)	Has on-shore pumping equipment been installed on property under the control of the operator and is that equipment at least 50 feet from the boundary of that property? crude line uses Kinder Morgan line pressure; butane line has pump internal to refinery and under control of operator.	x			
170.	195.262(e)	Has motive power, separate from pump station power, been provided for that fire protection equipment that incorporates pumps? crude line uses Kinder Morgan line pressure; butane line has pump internal to refinery. Note: pump station was not checked during this inspection as were considered “not regulated”. However, it appears the station should be included in regulated facilities—see Inspection Summary.			x	
171.	195.302	Is pressure testing being adequately conducted? (.304, .305, .306, .307) not observed during inspection			x	
172.	195.308	Pre-pressure Testing Pipe - Marking and Inventory none			x	
173.	195.402(c)(13)	Protect of personnel from hazards of unsafe accumulations of vapor or gas, at the excavation site. not observed during inspection			x	
174.	195.403(c)	Supervisor Knowledge of Emergency Response Procedures	x			
175.	195.410	Are line markers placed and maintained as required? 195.410(a) (195.410(b); 195.410(c); CGA Best Practices, v4.0, Practice 2-5; CGA Best Practices, v4.0, Practice 4-20)	x			
176.	480-75-540	Markers at exposed areas “camel back” areas near Intalco	x			
177.	195.412	Are the ROW conditions acceptable for the type of patrolling used?	x			
178.	195.420 (a), (b)	Valve Maintenance & Operation Tulsa Control room, personnel operated, but lines were flowing so could not operate				x
179.	195.420(c)	Valve Protection from Unauthorized Operation and Vandalism	x			
180.	195.426	Are launchers and receivers equipped with relief devices?	x			
181.	195.428(a)	Are inspections of overpressure safety devices adequate (including HVL lines)? (did not check operation during inspection)	x			

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FIELD REVIEW			S	U	N/A	N/C
182.	195.428(a)	Do pressure control devices installed on HVL pressure breakout tanks appear to be in satisfactory mechanical condition and to be functioning properly? No breakout tanks			x	
183.	195.428(c)	Do selected overfill protection systems on aboveground breakout tanks that were constructed or significantly altered after October 2, 2000 function properly and are they in good mechanical condition? [Note: This question applies to both non-HVL and HVL pressure breakout tanks.] No breakout tanks			x	
184.	480-75-320	Relief Device set at or below MOP not checked during field inspection				x

Comments:

FIELD REVIEW (Cont)			S	U	N/A	N/C
185.	480-75-300	Leak Detection – 8% in 15 Minutes not checked during field inspection				x
186.	480-75-300	Leak detection at flow and no flow conditions not checked during field inspection				x
187.	195.430	Has adequate fire protection equipment been installed at pump station/breakout tank areas and is it maintained properly? (195.430(a) (195.430(b); 195.430(c); 195.262(e)) Note: pump station was not checked during this inspection as were considered “not regulated”. However, it appears the station should be included in regulated facilities—see Inspection Summary.				x
188.	195.432	Breakout Tanks No breakout tanks			x	
189.	480-75-330	Do Breakout Tanks have independent overfill alarms? No breakout tanks			x	
190.	195.434	Are there operator signs around each pumping station, breakout tank area, and other applicable facilities? At each end of pipeline (AltaGas, Cherry Point Refinery, Kinder Morgan).	x			
191.	195.436	Security - Pumping Stations - Breakout Tanks none of these assets are part of this inspection			x	
192.	195.438	Is there signage that prohibits smoking and open flames around pump stations, launchers and receivers, breakout tank areas, or other applicable facilities?	x			
193.	195.446(a)	Is the SCADA display representative of the system configuration? 195.404(a) (195.505(f); 195.446(h)) control room is in Tulsa, OK, Control room inspection scheduled 10/10/16				x
194.	195.446(b)	Do operating personnel know the MOP of respective pump stations and associated alarm settings? control room is in Tulsa, OK Control room inspection scheduled 10/10/16				x
195.	195.446(h)	Do controllers demonstrate adequate skills and knowledge? 195.505(b) (195.446(g)(2) control room is in Tulsa, OK Control room inspection scheduled 10/10/16				x
196.	195.501-195.509	Important: Per OPS, the OQ Field Inspection Protocol Form 15 shall be used by the inspector as part of this standard inspection. When completed, the inspector will upload this information into the PHMSA OQ Database located at http://primis.phmsa.dot.gov/oqdb/home Form Completed/Uploaded? Y/N Y				
197.	195.571	Cathodic Protection (test station readings, other locations to ensure adequate CP levels)		x		
198.	195.573	Are rectifiers, interference bonds, diodes, and reverse current switches properly maintained and are they functioning properly?	x			
199.	195.575	Are measures performed to ensure electrical isolation of each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit? 195.575(a) (195.575(b); 195.575(c); 195.575(d))	x			

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200.	195.583	Atmospheric corrosion - Exposed pipeline components, (splash zones, water spans, soil/air interface, under thermal insulation, disbanded coatings, pipe supports, deck penetrations, etc.) 195.583(c) (195.581(a))	x			
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Comments:

Recent PHMSA Advisory Bulletins (Last 2 years)

<u>Number</u>	<u>Date</u>	<u>Subject</u>
ADB-2013-07	July 12, 13	Potential for Damage to Pipeline Facilities Caused by Flooding
ADB-12-10	Dec 5, 12	Using Meaningful Metrics in Conducting Integrity Management Program Evaluations
ADB-12-09	Oct 11, 12	Communication During Emergency Situations
ADB-12-08	Jul 31, 12	Inspection and Protection of Pipeline Facilities After Railway Accidents
ADB -12-06	May 7, 12	Verification of Records Establishing MAOP and MOP.
ADB-12-04	Mar 21, 12	Implementation of the National Registry of Pipeline and Liquefied Natural Gas Operators
ADB -12-03	Mar 6, 12	Notice to Operators of Driscopipe 8000 High Density Polyethylene Pipe of the Potential for Material Degradation

For more PHMSA Advisory Bulletins, go to <http://phmsa.dot.gov/pipeline/regs/advisory-bulletin>